

## **REMARKS**

Claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62-63, 71 and 96-98 were pending in this application. In the Office Action dated February 23, 2009, claims 1, 3, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62, 63, 71 and 96-98 were rejected.

Claims 1, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62-63 and 96-98 are hereby amended to recite inherent aspects of the invention as originally claimed. Claim 3 is canceled without prejudice or disclaimer.

Reconsideration of this application as amended, and allowance of all pending claims 1, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62-63, 71 and 96-98 are hereby respectfully requested.

## **Summary of Substance of Interview**

Applicant's representative, Dohyun Ahn (Reg. No., 63,237), conducted a telephone interview with Examiner Antim Shah and Examiner Harry Hong on April 23, 2009. During the interview, independent claim 1 and the cited references of U.S. Patent No. 6,985,478 to Pogossiants et al. ("Pogossiants") and U.S. Patent Application Publication No. 2003/0126470 to Crites et al. ("Crites") were discussed. No agreement was reached during the interview.

## **Supplemental Information Disclosure Statement**

A supplemental information disclosure statement including additional references is submitted herewith. The Examiner is respectfully requested to indicate consideration of the references in the next communication to the Applicant.

### **Rejection under 35 U.S.C. §103(a)**

Claims 1, 3, 12, 13, 15, 17-19, 20, 32, 40-42, 59, 62, 63, 71 and 96-98 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pogossiants in view of Crites. The rejection of claims 1, 12, 13, 15, 17-19, 20, 32, 40-42, 59, 62, 63, 71 and 96-98 are traversed in view of the amendment. Claim 3 is cancelled herein; and therefore, the rejection of claim 3 is now moot.

Independent claim 1, as amended, specifically recites:

*... a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities, at least one of the multiple prison facilities located remotely from the call processing system, each of the multiple prison facilities including multiple telephone terminals;*

*an unauthorized call activity detection system connected to the networking device for detecting three-way call activity associated with the calls to or from one or more of the multiple telephone terminals; and*

*a call application management system connected to the networking device and the unauthorized call activity detection system for at least processing the first VoIP data packets from the multiple prison facilities into first call signals and transmitting the first call signals to a first telephone carrier network, the call application management system receiving second call signals from the first telephone carrier network and processing the second call signals into the second VoIP data packets for distribution to the multiple prison facilities by the networking device. (Emphasis added).*

The centralized call processing system of claim 1 includes a networking device, an unauthorized call activity detection system and a call application management system. The networking device connects to call processing gateways at the multiple prison facilities via digital data links. The networking device collects first VoIP data packets and sends the first VoIP data packets to the call application management system. The call application manager

system processes the first VoIP data packets into call signals and transmits the call signals to a first telephone carrier network. The call application management system also receives second call signals and processes the second call signals into the second VoIP data packets. The networking device distributes the second VoIP data packets to the multiple prison facilities. The unauthorized call activity detection system detects three-way call activity associated with the calls to or from the multiple prison facility.

The feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities” is advantageous because first VoIP data packets and second call signals associated with the multiple prison facilities are collected and processed centrally at the call processing system. In this way, the need to provide various equipments for implementing various call processing functionalities at each prison facility may be obviated.

Pogossiants fails to disclose this feature. In Pogossiants, each T-Server is associated with only a single facility (i.e., call center). See Pogossiants, figure 5 and col. 11, 26-35. That is, Pogossiants does not disclose a T-Server providing call processing to multiple facilities. Although Pogossiants describes using T-Server control to perform load balancing between call centers (see Poggosiants, col. 12, ll. 20-23) or to distribute calls over a wide geographic region with many call centers (see Poggosiants, col. 12, ll. 37-45), Pogossiants does not specifically disclose any T-Server that provide call processing to multiple facilities. In other words, Poggosiants does not disclose any networking device for collecting any first VoIP data packets from multiple facilities and distributing second VoIP data packets to the

multiple facilities. Therefore, Pogossants fails to disclose the feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities” as recited in claim 1, as amended.

Nor does Crites disclose this feature. Crites was cited in the Office Action merely for disclosing detection of three-way call activity associated with calls placed using one or more telephone terminals. Nowhere in Crites does it describe any networking device for collecting any VoIP data packets from multiple facilities or distributing any VoIP data packets to the multiple facilities. Therefore, Crites also fails to disclose the feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities” as recited in claim 1, as amended.

Therefore, claim 1, as amended, is patentably distinguishable over Pogossants and Crites at least for reciting the feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities.”

Claims 12, 13, 15, 17-19, 20, 32, 40-42, 96 and 97 depend from claim 1. Therefore, the same arguments set forth above for claim 1 are equally applicable to claims 12, 13, 15, 17-19, 20, 32, 40-42, 96 and 97. Accordingly, claims 12, 13, 15, 17-19, 20, 32, 40-42, 96 and 97 are also patentably distinguishable over Pogossants and Crites.

Independent claim 59 also recites the features of “in a call processing system . . . collecting first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities via digital data links . . . distributing the second VoIP data packets associated with the calls to the multiple prison facilities via the digital data links.” Therefore, arguments set forth above for claim 1 are equally applicable to claim 59 and its dependent claims 62, 63, 71 and 98.

Claims 21, 22 and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pogossiants and Crites in further view of U.S. Patent No. 7,333,798 to Hodge (“Hodge”). This rejection is respectfully traversed.

Claim 1 recites the feature of “a networking device connected via digital data links to call processing gateways at the multiple prison facilities to collect first Voice over Internet Protocol (VoIP) data packets associated with calls from the multiple prison facilities and to distribute second VoIP data packets associated with the calls to the multiple prison facilities.” As set forth above, Pogossiants and Crites fail to disclose this feature. Nor does Hodge disclose these features. Hodge was cited in the Office Action for allegedly disclosing a justice application management system. Nowhere in Hodge does it disclose collecting or distributing any VoIP data packets.

Claims 21, 22 and 25 depend from claim 1. Therefore, the same arguments set forth above for claim 1 are equally applicable to claims 21, 22 and 25.

Applicant submits that claims 1, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62-63, 71 and 96-98 are distinguishable over the cited references for at least the reasons set forth above. Therefore, withdrawal of these rejections is respectfully requested.

**Conclusion**

It is submitted that all pending claims 1, 12, 13, 15, 17-22, 25, 32, 40-42, 59, 62-63, 71 and 96-98, as amended, are in condition for allowance. Favorable action is solicited.

Respectfully Submitted,  
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